

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

**Tim Doupe
Debtor**

Chapter:7

Case number:1:21-bk-00837

Matter: Motion to Avoid Judgment

**Tim Doupe
Movant**

vs.

**CAVALRY SPV I LLC
Respondent**

NOTICE

NOTICE OF OPPORTUNITY TO OBJECT AND HEARING: Pursuant to Local Rule 2002-1(a), the Court will consider this motion, objection or other matter without further notice or hearing unless a party in interest files an objection/response within twenty-one (21) days of the date of the notice. If you object to the relief requested, you must file your objection/response with the Clerk, United States Bankruptcy Court, The Sylvia H. Rambo US Courthouse, 1501 North 6th Street, Bankruptcy Courtroom 8, 4th Floor, Harrisburg, PA 17102 and serve a copy on the movant and movant's attorney, if one is designated.

If you file and serve an objection/response within the time permitted, the Court may schedule a hearing and you will be notified. If you do not file an objection within the time permitted the Court will deem the motion unopposed and proceed to consider the motion without further notice or hearing, and may grant the relief requested.

Date: April 21, 2023

Kara Gendron, Esquire
Attorney ID #87577
Mott & Gendron Law
125 State Street
Harrisburg, PA 17101
<http://www.mottgendronlaw.com>
T: (717) 232-6650 | F: (717) 232-0477

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	::	CHAPTER 7
TIM DOUPE	:	
Debtor	:	CASE NO. 1:21-bk-00837
	:	
TIM DOUPE	:	
Movant	:	
	:	
v.	:	
	:	
CAVALRY SPV I LLC	:	
Respondent	:	

**MOTION TO AVOID LIEN OF RESPONDENT
UNDER SECTION 522(f) OF THE BANKRUPTCY CODE**

COMES NOW the Debtor, by and through Kara K. Gendron, Esquire and makes this Motion respectfully stating in support thereof:

1. The Debtor filed a Chapter 7 Petition on April 15, 2021.
2. The Debtor is an adult individual residing at 17 Salt Road Enola, PA 17025.
3. Respondent maintains a mailing address of ATTN CEO & PRESIDENT, 5500 SUMMIT LAKE DRIVE STE 400, VALHALLA, NY 10595-1340.
4. The Respondent holds a judicial lien against the Debtor in the amount of \$2,654.83 entered in Cumberland County at docket number # 2020-04378.
5. The Debtor has listed all property the Debtor owns on the Bankruptcy schedules.
6. All property listed by the Debtor has been exempted as follows:

Asset	Value	Lien	Exemption	Equity
17 Salt Road Enola, PA 17025	\$160,100.00	\$135,305.00	522(d)(1)	\$24,795.00

7. No one has challenged either the value of the property or the exemption claimed.
8. The Respondent does not have a purchase money security interest in household goods, or a possessory interest.

9. The judgment of the Respondent potentially stands to impair the exemption of the Debtor under Section 522(d) of the Bankruptcy Code. The judgment is a judicial lien.
10. The Debtor seeks under Section 522(f) of the Bankruptcy Code to avoid the judgment of the Respondent.

WHEREFORE, the Debtor respectfully requests that this Court enter an Order avoiding the aforesaid judgment under Section 522(f) of the Bankruptcy Code and granting such other relief as this Court deems just.

Respectfully submitted,

/s/ Kara K. Gendron
Kara Gendron, Esquire
Attorney ID #87577
Mott & Gendron Law
125 State Street
Harrisburg, PA 17101
<http://www.mottgendronlaw.com>
T: (717) 232-6650 | F: (717) 232-0477

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 7
TIM DOUPE	:	
Debtor	:	CASE NO. 1:21-bk-00837
	:	
TIM DOUPE	:	
Movant	:	
	:	
v.	:	
	:	
CAVALRY SPV I LLC	:	
Respondent	:	
	:	
	:	

ORDER

UPON consideration of the foregoing Motion to Avoid Judgment of Respondent under Section 522(f) of the Bankruptcy Code , it is hereby

ORDERED AND DECREED that the relief prayed for in the Motion be, and hereby is granted, to wit, the judgment of CAVALRY SPV I LLC in the approximate amount of \$2,654.83 entered in Cumberland County at docket number # 2020-04378 be and hereby is avoided; it is further

ORDERED AND DECREED that a certified copy of this Order may be filed with the Prothonotary of Cumberland County and the Prothonotary is directed to terminate the judgment in the judgment indices.

[illegible]

I, Kara K. Gendron, hereby certify that on April 21, 2023, I served a copy of the notice and Motion to Avoid Lien electronically or by placing the same in the United States Mail, First Class, postage pre-paid, addressed as follows:

/s/ Kara K. Gendron
Attorney ID #87577
Mott & Gendron Law
125 State Street
Harrisburg, PA 17101
<http://www.mottgendronlaw.com>
T: (717) 232-6650 | F: (717) 232-0477